

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
DANNY LANE KEYS and) Bk. No. **12-07578-RM2-13**
JANICE DIANE KEYS,) Chapter 13
80 Timberline Road) Judge Randal S. Mashburn
Crossville, TN 38571)
SSN: XXX-XX-8108 SSN: XXX-XX-0264)
Debtor(s).)

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: September 30, 2014
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: November 13, 2014 at 9:30 a.m. in the L. Clure Morton
Federal Building & Post Office, 9 Broad Street, Cookeville, Tennessee 38501

TRUSTEE'S OBJECTION TO DEBTORS' MOTION TO MODIFY PLAN
AND REQUEST FOR HEARING THEREON

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters in the Middle District of Tennessee, respectfully objects to the Application by the debtors to modify their plan seeking to have the Court find that their plan is "deemed complete" and requesting a discharge be promptly entered.

The debtors made no payments in support of their plan for the month of August 2014 and, accordingly, the mortgage obligations payable to Glenn and Beatrice Terry are in arrears. The Trustee submits that the debtors' request that the plan "be deemed complete" is inaccurate and inappropriate and should be denied.

WHEREFORE, THE PREMISES CONSIDERED, the Trustee requests this Court deny the debtors' Application to Modify the Chapter 13 Plan and requests a hearing thereon.

Respectfully submitted,

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certifies that on or before the 26th day of September, 2014, a true and correct copy of the foregoing has been served in the following manner:

Email by Electronic Case Noticing to:

U. S. Trustee
Steven L. Lefkovitz, Counsel for Debtors

By U. S. Postal Service, postage prepaid to:

Danny L. and Janice D. Keys, 80 Timberline Road, Crossville, TN 38571
Glenn and Beatrice Terry, 806 Oakley Way, Gatlinburg, TN 37738
Howard G. Pick, P. O. Box 3285, Crossville, TN 38557

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee